

EXHIBIT 12

From: [Laura Harris](#)
To: [Igor Litvak](#); [Andrew Michaelson](#); [Kathleen McCarthy](#); [David Mattern](#); [Sumon Dantiki](#)
Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC
Date: Wednesday, February 23, 2022 6:06:00 PM

Igor,

Thank you for your email. Without any showing supporting the merits of your clients' request to set aside the entry of default, or any demonstration of their ability to cooperate, we cannot agree to a joint submission to the Court and do not think a status conference is warranted. Nor is there any basis to discuss settlement. We intend to file our motion for default judgment on Tuesday, consistent with the Court's order.

Thank you,
Laura

Laura Harris
King & Spalding

From: Igor Litvak <Igor@LitvakLawNY.com>
Sent: Wednesday, February 23, 2022 11:10 AM
To: Laura Harris; Andrew Michaelson; Kathleen McCarthy; David Mattern; Sumon Dantiki
Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

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Laura, can we talk today???

Igor Litvak, Esq.
The Litvak Law Firm, PLLC
1733 Sheepshead Bay Road, Suite 22
Brooklyn, NY 11235
Tel/Fax: 718-989-2908
Email: Igor@LitvakLawNY.com
Website: www.nyccrimelawyer.com

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From: Igor Litvak <Igor@LitvakLawNY.com>
Sent: Tuesday, February 22, 2022 1:01 PM
To: Laura Harris <lharris@kslaw.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <dmattern@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

Hi Laura,

I also filed a NOA for Filippov yesterday. Regarding what we discussed last week, my clients are not ready to discuss any potential cooperation right now, we would like to file a motion to set aside the Notice of Default, and then, if it's successful, we will work on everything else, discovery, settlement, potential cooperation, etc. However, if Google is willing to set aside the notice of default voluntarily, then of course we can move on to discovery, cooperation, and settlement much faster. Let's out a joining letter together asking the court for a remote status conference and then for a briefing schedule, thank you.

Sincerely,

Igor Litvak, Esq.
The Litvak Law Firm, PLLC
1733 Sheepshead Bay Road, Suite 22
Brooklyn, NY 11235
Tel/Fax: 718-989-2908
EMail: Igor@LitvakLawNY.com
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From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Thursday, February 17, 2022 7:47 PM

To: Laura Harris <lharris@kslaw.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

Zoom? yes logging in now

Igor Litvak, Esq.
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notify us immediately by returning it to the sender, delete this copy from your system and destroy any hard copy that you may have made. Thank you.

From: Laura Harris <lharris@kslaw.com>

Sent: Thursday, February 17, 2022 7:47 PM

To: Igor Litvak <Igor@LitvakLawNY.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

Just circulated a dial in—Will that work?

Laura Harris
King & Spalding
M: +1 917 767 6383

From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Thursday, February 17, 2022 7:43:11 PM

To: Laura Harris <lharris@kslaw.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

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Yes, I do. 6467964905.

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From: Laura Harris <lharris@kslaw.com>

Sent: Thursday, February 17, 2022 7:42:26 PM

To: Igor Litvak <Igor@LitvakLawNY.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

Hi, Igor,
Do you have a few minutes for a quick call?

Thanks,
Laura

Laura Harris
King & Spalding
M: +1 917 767 6383

From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Wednesday, February 16, 2022 2:58:33 PM

To: Laura Harris <lharris@kslaw.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

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Yes, that works for me, thanks.

Get [Outlook for iOS](#)

From: Laura Harris <lharris@kslaw.com>

Sent: Wednesday, February 16, 2022 2:18:15 PM

To: Igor Litvak <Igor@LitvakLawNY.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: RE: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

How about tomorrow at 3p? If that works, we're happy to circulate a dial-in number.

Thanks,
Laura

From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Wednesday, February 16, 2022 10:08 AM

To: Laura Harris <lharris@kslaw.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; Bethany Rupert <BRupert@KSLAW.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

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Hi Laura, I will be available today any time after 3 pm, or any time tomorrow. Please call me on my cell at 646-796-4905. Thank you.

Igor Litvak, Esq.
The Litvak Law Firm, PLLC
1733 Sheepshead Bay Road, Suite 22
Brooklyn, NY 11235
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Email: Igor@LitvakLawNY.com
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From: Laura Harris <lharris@kslaw.com>

Sent: Wednesday, February 16, 2022 7:08 AM

To: Igor Litvak <Igor@LitvakLawNY.com>; Andrew Michaelson <amichaelson@kslaw.com>; Kathleen McCarthy <kmccarthy@kslaw.com>; Bethany Rupert <BRupert@KSLAW.com>; David Mattern <DMattern@KSLAW.com>; Sumon Dantiki <sdantiki@kslaw.com>

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

Mr. Litvak,

Thank you for your email. We are conferring with our client regarding your request, but please let me know if there are any windows when you are available to speak this afternoon or tomorrow.

Thank you,
Laura

Laura Harris
King & Spalding

From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Tuesday, February 15, 2022 3:27 PM

To: Andrew Michaelson; Kathleen McCarthy; Laura Harris; Bethany Rupert; David Mattern; Sumon Dantiki

Subject: Re: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

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Counsel,

I had a chance to review the docker closer and see that the Notice of Default was already filed, and therefore, as a follow-up to my email, I would ask that you move to set aside this notice or we gonna file a motion to set it aside, thank you. Please call me to discuss this further, 646-796-4905, thank you.

Sincerely,

Igor Litvak, Esq.
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1733 Sheepshead Bay Road, Suite 22
Brooklyn, NY 11235
Tel/Fax: 718-989-2908
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destroy any hard copy that you may have made. Thank you.

From: Igor Litvak

Sent: Tuesday, February 15, 2022 1:55 PM

To: amichaelson@kslaw.com <amichaelson@kslaw.com>; kmccarthy@kslaw.com <kmccarthy@kslaw.com>; lharris@kslaw.com <lharris@kslaw.com>; brupert@kslaw.com <brupert@kslaw.com>; dmatern@kslaw.com <dmatern@kslaw.com>; sdantiki@kslaw.com <sdantiki@kslaw.com>

Subject: Google v Dmitry Starovikov, Alexander Filippov, 1:21-cv-10260-DLC

Hello Counsel,

I am in the process of being retained by Dmitry Starovikov and Alexander Filippov in the above-mentioned case and expect to file a NOA in a few days. I am emailing to ask that once I file my NOA that you withdraw your motion for default judgment and consent to defendants filing a late answer, which I expect to file a few weeks after filing my NOA. The defendant will consent to personal jurisdiction in this matter. If you need to reach me please call my cell at 646-796-4905, thank you.

Sincerely,

Igor Litvak, Esq.

The Litvak Law Firm, PLLC

1733 Sheepshead Bay Road, Suite 22

Brooklyn, NY 11235

Tel/Fax: 718-989-2908

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